

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of )  
 )  
Application by BellSouth Corporation, )  
And Its Subsidiaries, BellSouth )  
Telecommunications, Inc., And )  
BellSouth Long Distance, Inc. )  
For Authorization To Provide, )  
In-Region InterLATA Services )  
in Florida and Tennessee )

**WC Docket No. 02-307**

**COMMENTS REGARDING  
BELLSOUTH CORPORATION APPLICATION FOR  
AUTHORIZATION UNDER SECTION 271 OF THE COMMUNICATIONS ACT  
TO PROVIDE IN-REGION, INTERLATA SERVICES  
IN THE STATES OF FLORIDA AND TENNESSEE**

**SUBMITTED BY THE**

**COMMUNITY ACTION PARTNERSHIP**

October 10, 2002

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The Community Action Partnership hereby supports BellSouth's joint Florida and Tennessee 271 applications (hereinafter referred to as Application) filed by BellSouth Corporation, and its subsidiaries, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., (hereinafter referred to as BellSouth) for authorization to provide in-region, interLATA service in the States of Florida and Tennessee, pursuant to section 271 of the Communications Act of 1934, as amended (the Act), 47 U.S.C. § 271. We urge the Commission to undertake an expeditious review and approval of BellSouth's Application.

As expressed in greater detail below, we support BellSouth's Application as being in the public interest and of real benefit to telecommunications consumers in the States of Florida and Tennessee. The primary goal of the Telecommunications Act of 1996 is to promote competition in the telecommunications marketplace. BellSouth has demonstrated that it has met the tests of the Act and its entry as a long distance competitor will open the floodgates of competition in Florida and Tennessee.

## **I. Statements of Interest**

**The Community Action Partnership (CAP)** serves as a national forum for policy on poverty and to strengthen, promote, represent and serve its network of member agencies to assure that the issues of the poor are effectively heard and addressed. CAP advances the economic condition, educational attainment, political influence, health and civil rights of low-income Americans through community-based programs operating at

more than 900 Community Action Agencies nationwide. It is CAP's mission to ensure that low-income Americans are not left behind.

## **II. Comments**

Six years have passed since Congress approved the Telecommunications Act of 1996 (the Act). Although the Act promised Americans economic development, job creation, and access for consumers to competitive communications services, only a fraction of Americans enjoy this promise. Consumers in a few states such as Mississippi, Texas, Kansas, North Carolina, Georgia and Louisiana are realizing the benefits of the Act. Americans require rapid deployment of a fully competitive marketplace to ensure that consumers in Florida and Tennessee and across the nation will reap the benefits of economic development, job creation, and affordable access to modern telecommunications products and services.

CAP supports BellSouth's Application with the Commission. BellSouth's application comes after diligent work to meet the 14-point competitive checklist specified in the Act. The requirements of Section 271(c) include the 14-point competitive checklist for access and interconnection on fair and nondiscriminatory terms, as well as nondiscriminatory access to BellSouth's Operations Support Systems (OSS) and the existence of appropriate OSS performance measures and remedies.

CAP believes that consumers in Florida and Tennessee will benefit from Bellsouth's entry into the long distance market through increased competition and the lowering of basic rates. Consumers often depend on long distance telephone service to

maintain contact with family members and friends who live in distant locations. Unfortunately, many consumers typically rely on basic rates for their phone service rather than taking advantage of calling plans. Despite massive advertising and aggressive marketing by long distance companies, most consumers still pay basic rates, the highest rates available, and have not seen significant savings in their long distance bills as the cost of providing service has gone down.

CAP understands and appreciates the Commission's role in carefully examining this Application, but the Commission should not use this process to inhibit competition in this dynamically changing marketplace. By doing so, the benefits of increased competition and choice for all telecommunications consumers will not be realized. Additionally, given recent events, it is more important than ever that consumers be provided access to competitive long distance rates. CAP anticipates that BellSouth will uphold the precedents set in Alabama, Mississippi, Georgia, and Louisiana, among others, by offering Florida and Tennessee residential consumers in calling plans that are simpler and less expensive than most.

CAP believes the BellSouth's Application should be approved on its merits and for its ability to bring reality to the competitive goals of the Act. Florida and Tennessee consumers deserve the opportunity of choice for their local, long distance and advanced telephony services. It is not in the public interest to delay or deny for any considerable period of time, the entry of a new and major competitor for long distance services in Florida or Tennessee. As in other states that have competitive long distance services,

consumers in Florida and Tennessee will recognize immediate benefits from competition, once BellSouth begins to offer long distance service in these states.

### **III. Conclusion**

CAP, again, asserts that BellSouth's Application should be approved. We trust that the Commission will come to this same conclusion and take positive steps to offer Florida and Tennessee consumers the benefits of competition that the Act envisioned. The Commission must look at the pro-competitive benefits of BellSouth's Application and quickly approve it.

Respectfully submitted,

//s//

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